

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
JENNIFER RODRIGUEZ, individually, and as
the natural Mother and lawful guardian of
PATRICK ALFORD, JR., an infant minor,

Plaintiff,

-against-

CITY OF NEW YORK,
NATALIA ROSADO, individually and in her
capacity as a Child Protective Specialist for
Administration for Children's Services;
ROBERT SALEMI, individually and in his
capacity as a Supervisor of Child Protective
Specialists for Administration for Children's Services;
ST. VINCENT'S SERVICES, INCORPORATED;
CARLENE ANDERSON, individually and in her
capacity as a Case Worker for Defendant St. Vincent's
Services, Incorporated;
ZOILA VILLALTA, individually and in her capacity as
a supervisor of case workers for defendant St. Vincent's
Services, Incorporated, LIBRADA MORAN,

Defendants.

-----X
C O U N S E L O R S:

The defendants, THE CITY OF NEW YORK, NATALIA ROSADO and ROBERT SALEMI ("City" or "City Defendants"), by and through the undersigned attorneys, answering the Amended Complaint of the plaintiffs, respectfully set forth and allege upon information and belief:

1. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered "1" of the Amended Complaint and respectfully refer questions of law to the court.

2. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered "2" of the Amended Complaint and respectfully refer questions of law to the court.

3. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “3” of the Amended Complaint and respectfully refer questions of law to the court.

4. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “4” of the Amended Complaint and respectfully refer questions of law to the court.

5. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “5” of the Amended Complaint and respectfully refer questions of law to the court.

6. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “6” of the Amended Complaint and respectfully refer questions of law to the court.

7. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “7” of the Amended Complaint.

7a. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “7a” of the Amended Complaint.

8. Deny upon information and belief each and every allegation contained in paragraph numbered “8” of the Amended Complaint, but admit that defendant THE CITY OF NEW YORK is a municipal entity and respectfully refer questions of law to the court.

9. Deny each and every allegation contained in paragraph numbered “9” of the Amended Complaint.

9a. Deny each and every allegation contained in paragraph numbered “9a” of the Amended Complaint.

10. Deny knowledge or information sufficient to form a belief as to the truth of the

allegations contained in paragraph numbered “10” of the Amended Complaint.

11. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “11” of the Amended Complaint.

12. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “12” of the Amended Complaint.

13. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “13” of the Amended Complaint.

14. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “14” of the Amended Complaint.

15. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “15” of the Amended Complaint.

16. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “16” of the Amended Complaint.

17. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “17” of the Amended Complaint.

18. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “18” of the Amended Complaint.

19. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “19” of the Amended Complaint.

20. Deny upon information and belief each and every allegation contained in paragraph numbered “20” of the Amended Complaint, but admit that Rodriguez called the defendant Administration for Children’s Services.

21. Deny upon information and belief each and every allegation contained in paragraph

numbered “21” of the Amended Complaint, but admit that J. A. was removed on or about December 29, 2009.

22. Deny upon information and belief each and every allegation contained in paragraph numbered “22” of the Amended Complaint, but admit that Patrick Alford was removed on or about December 29, 2009.

23. Deny upon information and belief each and every allegation contained in paragraph numbered “23” of the Amended Complaint and respectfully refer questions of law to the court.

24. Deny upon information and belief each and every allegation contained in paragraph numbered “24” of the Amended Complaint and respectfully refer to the contract between the City of New York and St. Vincent’s Services, Incorporated for responsibilities of the parties.

25. Deny upon information and belief each and every allegation contained in paragraph numbered “25” of the Amended Complaint.

26. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “26” of the Amended Complaint.

27. Deny upon information and belief each and every allegation contained in paragraph numbered “27” of the Amended Complaint.

28. Deny upon information and belief each and every allegation contained in paragraph numbered “28” of the Amended Complaint.

29. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “29” of the Amended Complaint.

30. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “30” of the Amended Complaint.

31. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “31” of the Amended Complaint.

32. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “32” of the Amended Complaint.

33. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “33” of the Amended Complaint.

34. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “34” of the Amended Complaint.

35. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “35” of the Amended Complaint.

36. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “36” of the Amended Complaint.

37. Deny upon information and belief each and every allegation contained in paragraph numbered “37” of the Amended Complaint.

38. Deny upon information and belief each and every allegation contained in paragraph numbered “38” of the Amended Complaint.

39. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “39” of the Amended Complaint.

40. Deny upon information and belief each and every allegation contained in paragraph numbered “40” of the Amended Complaint.

41. Deny upon information and belief each and every allegation contained in paragraph numbered “41” of the Amended Complaint.

42. Deny upon information and belief each and every allegation contained in paragraph numbered “42” of the Amended Complaint.

43. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “43” of the Amended Complaint.

44. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “44” of the Amended Complaint.

45. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “45” of the Amended Complaint.

46. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “46” of the Amended Complaint.

47. Deny upon information and belief each and every allegation contained in paragraph numbered “47” of the Amended Complaint.

48. Deny upon information and belief each and every allegation contained in paragraph numbered “48” of the Amended Complaint and respectfully refer questions of law to the court.

49. Deny upon information and belief each and every allegation contained in paragraph numbered “49” of the Amended Complaint and respectfully refer questions of law to the court.

50. Deny upon information and belief each and every allegation contained in paragraph numbered “50” of the Amended Complaint and respectfully refer questions of law to the court.

51. Deny upon information and belief each and every allegation contained in paragraph numbered “51” of the Amended Complaint and respectfully refer questions of law to the court.

52. Deny upon information and belief each and every allegation contained in paragraph numbered “52” of the Amended Complaint and respectfully refer questions of law to the court.

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58. Deny upon information and belief each and every allegation contained in paragraph numbered “58” of the Amended Complaint and respectfully refer questions of law to the court.

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60. Deny upon information and belief each and every allegation contained in paragraph numbered “60 of the Amended Complaint and respectfully refer questions of law to the court.

61. Deny upon information and belief each and every allegation contained in paragraph numbered “61 of the Amended Complaint and respectfully refer questions of law to the court.

62. Deny upon information and belief each and every allegation contained in paragraph numbered “62 of the Amended Complaint and respectfully refer questions of law to the court.

63. Deny upon information and belief each and every allegation contained in paragraph numbered “63 of the Amended Complaint and respectfully refer questions of law to the court.

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67. Deny upon information and belief each and every allegation contained in paragraph numbered “67 of the Amended Complaint and respectfully refer questions of law to the court.

68. Deny upon information and belief each and every allegation contained in paragraph numbered “68 of the Amended Complaint and respectfully refer questions of law to the court.

69. Deny upon information and belief each and every allegation contained in paragraph numbered “69 of the Amended Complaint and respectfully refer questions of law to the court.

70. Deny upon information and belief each and every allegation contained in paragraph numbered “70” of the Amended Complaint and respectfully refer questions of law to the court.

71. Deny upon information and belief each and every allegation contained in paragraph numbered “71” of the Amended Complaint and respectfully refer questions of law to the court.

72. Deny upon information and belief each and every allegation contained in paragraph numbered “72” of the Amended Complaint and respectfully refer questions of law to the court.

73. Deny upon information and belief each and every allegation contained in paragraph numbered “73” of the Amended Complaint and respectfully refer questions of law to the court.

74. Deny upon information and belief each and every allegation contained in paragraph numbered “74” of the Amended Complaint and respectfully refer questions of law to the court.

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76. Deny upon information and belief each and every allegation contained in paragraph numbered “76” of the Amended Complaint and respectfully refer questions of law to the court.

77. Deny upon information and belief each and every allegation contained in paragraph numbered “77” of the Amended Complaint and respectfully refer questions of law to the court.

78. Deny each and every allegation contained in paragraph numbered “78” of the Amended Complaint.

79. Deny each and every allegation contained in paragraph numbered “79” of the Amended Complaint.

80. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “80” of the Amended Complaint.

81. Deny upon information and belief each and every allegation contained in paragraph numbered “81” of the Amended Complaint.

82. Deny upon information and belief each and every allegation contained in paragraph numbered “82” of the Amended Complaint.

83. Deny each and every allegation contained in paragraph numbered “83” of the Amended Complaint.

84. Deny each and every allegation contained in paragraph numbered “84” of the Amended Complaint.

85. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “85” of the Amended Complaint.

86. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “86” of the Amended Complaint.

87. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “87” of the Amended Complaint.

88. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “88” of the Amended Complaint.

89. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “89” of the Amended Complaint.

90. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “90” of the Amended Complaint.

91. Deny upon information and belief each and every allegation contained in paragraph numbered “91” of the Amended Complaint.

92. Deny upon information and belief each and every allegation contained in paragraph numbered “92” of the Amended Complaint and respectfully refer questions of law to the court.

93. Deny upon information and belief each and every allegation contained in paragraph numbered “93” of the Amended Complaint and respectfully refer questions of law to the court.

94. Deny upon information and belief each and every allegation contained in paragraph numbered “94” of the Amended Complaint and respectfully refer questions of law to the court.

95. Deny upon information and belief each and every allegation contained in paragraph numbered “95” of the Amended Complaint and respectfully refer questions of law to the court.

96. Deny upon information and belief each and every allegation contained in paragraph numbered “96” of the Amended Complaint and respectfully refer questions of law to the court.

97. Deny upon information and belief each and every allegation contained in paragraph numbered “97” of the Amended Complaint and respectfully refer questions of law to the court.

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99. Deny each and every allegation contained in paragraph numbered “99” of the Amended Complaint.

100. Deny each and every allegation contained in paragraph numbered “100” of the Amended Complaint.

101. Deny upon information and belief each and every allegation contained in paragraph numbered “101” of the Amended Complaint and respectfully refer questions of law to the court.

102. Deny upon information and belief each and every allegation contained in paragraph numbered “102” of the Amended Complaint and respectfully refer questions of law to the court.

103. Deny upon information and belief each and every allegation contained in paragraph numbered “103” of the Amended Complaint and respectfully refer questions of law to the court.

104. Deny upon information and belief each and every allegation contained in paragraph numbered “104” of the Amended Complaint and respectfully refer questions of law to the court.

105. Deny each and every allegation contained in paragraph numbered “105” of the Amended Complaint.

106. Deny upon information and belief each and every allegation contained in paragraph numbered “106” of the Amended Complaint.

107. Deny upon information and belief each and every allegation contained in paragraph numbered “107” of the Amended Complaint.

108. Deny upon information and belief each and every allegation contained in paragraph numbered “108” of the Amended Complaint.

109. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “109” of the Amended Complaint.

110. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “110” of the Amended Complaint.

111. Deny upon information and belief each and every allegation contained in paragraph numbered “111” of the Amended Complaint.

112. Deny upon information and belief each and every allegation contained in paragraph numbered “112” of the Amended Complaint and respectfully refer questions of law to the court.

113. Deny each and every allegation contained in paragraph numbered “113” of the Amended Complaint.

ANSWERING THE FIRST FEDERAL CLAIM

114. Answering paragraph numbered “114” of the Amended Complaint,

defendants, THE CITY OF NEW YORK (“CITY”), NATALIA ROSADO and ROBERT SALEMI, repeat, re-allege and re-new all responses contained in paragraphs 1 through 113 of the Answer to the Amended Complaint.

115. Deny upon information and belief each and every allegation contained in paragraph numbered “115” of the Amended Complaint and respectfully refer questions of law to the court.

116. Deny upon information and belief each and every allegation contained in paragraph numbered “116” of the Amended Complaint and respectfully refer questions of law to the court.

117. Deny each and every allegation contained in paragraph numbered “117” of the Amended Complaint.

118. Deny each and every allegation contained in paragraph numbered “118” of the Amended Complaint.

119. Deny each and every allegation contained in paragraph numbered “119” of the Amended Complaint.

120. Deny each and every allegation contained in paragraph numbered “120” of the Amended Complaint.

ANSWERING THE SECOND FEDERAL CLAIM

121. Answering paragraph numbered “121” of the Amended Complaint, City Defendants repeat, re-allege and re-new all responses contained in paragraphs 1 through 120 of the Answer to the Amended Complaint.

122. Deny upon information and belief each and every allegation contained in paragraph numbered “122” of the Amended Complaint and respectfully refer questions of law to the court.

123. Deny upon information and belief each and every allegation contained in paragraph numbered “123” of the Amended Complaint and respectfully refer questions of law to the court.

124. Deny upon information and belief each and every allegation contained in paragraph

numbered “124” of the Amended Complaint and respectfully refer questions of law to the court.

125. Deny each and every allegation contained in paragraph numbered “125” of the Amended Complaint.

126. Deny each and every allegation contained in paragraph numbered “126” of the Amended Complaint.

ANSWERING THE FIRST STATE LAW CLAIM

127. Answering paragraph numbered “127” of the Amended Complaint, City Defendants repeat, re-allege and re-new all responses contained in paragraphs 1 through 126 of the Answer to the Amended Complaint.

128. Deny each and every allegation contained in paragraph numbered “128” of the Amended Complaint.

129. Deny upon information and belief each and every allegation contained in paragraph numbered “129” of the Amended Complaint and respectfully refer questions of law to the court.

130. Deny each and every allegation contained in paragraph numbered “130” of the Amended Complaint.

131. Deny each and every allegation contained in paragraph numbered “131” of the Amended Complaint.

132. Deny each and every allegation contained in paragraph numbered “132” of the Amended Complaint.

ANSWERING THE SECOND STATE LAW CLAIM

133. Answering paragraph numbered “133” of the Amended Complaint, City Defendants repeat, re-allege and re-new all responses contained in paragraphs 1 through 132 of the Answer to the Amended Complaint.

134. Deny upon information and belief each and every allegation contained in paragraph

numbered “134” of the Amended Complaint and respectfully refer questions of law to the court.

135. Deny each and every allegation contained in paragraph numbered “135” of the Amended Complaint.

136. Deny each and every allegation contained in paragraph numbered “136” of the Amended Complaint.

ANSWERING THE THIRD STATE LAW CLAIM

137. Answering paragraph numbered “137” of the Amended Complaint, City Defendants repeat, re-allege and re-new all responses contained in paragraphs 1 through 136 of the Answer to the Amended Complaint.

138. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “138” of the Amended Complaint.

139. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “139” of the Amended Complaint.

ANSWERING THE FOURTH STATE LAW CLAIM

140. Answering paragraph numbered “140” of the Amended Complaint, City Defendants repeat, re-allege and re-new all responses contained in paragraphs 1 through 139 of the Answer to the Amended Complaint.

141. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “141” of the Amended Complaint.

142. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph numbered “142” of the Amended Complaint.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

143. The complaint fails to state a claim upon which relief can be granted, including the claim for punitive damages which is not be recoverable against the City Defendants.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

144. Defendants are entitled to qualified immunity.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

145. At all times relevant to the acts alleged in the complaint, the conduct of the Defendants were reasonable, proper, lawful, constitutional, in good faith and without malice.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

146. Defendants assert the limitations of Article 16 of the CPLR as to all state based claims asserted in this Amended Complaint which are determined by this Court to be subject to the limitations of said statute.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

147. Any injuries or damages claimed were caused, in whole or in part, by the negligence, intentional acts or other culpable conduct of third parties over whom this answering defendant had no control.

AS AND FOR A SIXTH AFFIRMATIVE DEFENSE

148. Defendants contend that plaintiffs are barred from prosecuting some of his claims by the doctrines of res judicata and/or collateral estoppel.

AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE

149. Some or all of these claims are barred by the statute of limitations.

AS AND FOR A CROSS-CLAIM AGAINST ST. VINCENT'S SERVICES, INC.

150. That if the plaintiffs were caused to sustain damages at the time and place set forth in the Amended Complaint and in the manner alleged therein through any carelessness, recklessness, acts omissions, negligence and/or breaches of duty and/or warranty and/or contract other than

plaintiffs', then said damages arose out of the carelessness, recklessness, acts, omissions, negligence and breaches of duty and/or obligation, and/or statute, and/or warranty, and/or contract in fact or implied in law, upon the part of ST. VINCENT'S SERVICES, INC. and its employees, and the City Defendants are entitled to contractual and/or common law indemnification and/or contribution under *Dole v Dow*.

WHEREFORE, THE CITY OF NEW YORK, NATALIA ROSADO, and ROBERT SALEMI demand judgment dismissing the Amended Complaint of the plaintiffs herein as to this answering defendant, judgment in its favor on the cross-claim, together with the costs, fees, and disbursements of this action.

Dated: New York, New York
November 4, 2011

Yours, etc.,
BARRY, MCTIERNAN & MOORE

By: Suzanne M. Halbardier
SUZANNE M. HALBARDIER, ESQ. (SMH-0310)
Attorneys for Defendants
THE CITY OF NEW YORK
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ROSADO, and ROBERT SALEMI
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(212) 313 - 3600
File No.: NYC54816

TO:

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Attorneys for Defendant St. Vincent's Services, Inc

Ms. Librada Moran
130 Vandalia Avenue, #11B
Brooklyn, New York

CERTIFICATE OF SERVICE

Suzanne M. Halbardier, an attorney duly admitted to practice law in the State of New York, hereby certifies that a true and accurate copy of the attached Answer was served via ECF and by first class mail with postage prepaid on November 4, 2011 to the following recipients:

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Suzanne M. Halbardier
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